

Submission from Straterra

To the Ministry for the Environment

Climate Change Adaptation

June 2022

Introduction

1. Straterra is the industry association representing the New Zealand minerals and mining sector. Our membership is comprised of mining companies, explorers, researchers, service providers, and support companies.
2. The sector is proud to be part of the solution to climate change. The products of mining will play an important role in reducing global emissions as well as helping New Zealand adapt to the changing climate.
3. We welcome the opportunity to comment on the Ministry for the Environment's National Adaptation Plan (NAP) and consultation document, [Building a Climate Resistant New Zealand](#).
4. We strongly support the adoption of a National Adaptation Plan (NAP) for New Zealand. It is important that the country, public and private sector, plans ahead and prepares for a changing climate.
5. The focus of government policy and actions (local and central government) over the last three decades, has been on mitigation, ie New Zealand's contribution to reducing global emissions, and not enough on the need to plan for a changing climate.
6. Our submission focuses on the crucial role minerals and extractive sector will play in strengthening our resilience to a changing climate and to "managed retreat" as it needs to occur, and the need for the regulatory environment to be accommodative of mineral extraction to facilitate this.

The impacts of climate change and the role of minerals

7. While we accept the document is a high level, direction-setting plan, we are surprised to see no references to our sector anywhere within the consultation document or the NAP, in connection with climate adaptation.
8. The projected impacts of climate change on New Zealand are well known. They include increased intensity and frequency of extreme weather events and sea level rise.
9. The extractive sector will play a vital role in protecting, accommodating and retreating from the effects of climate change, to use the terms in the model described on page 9 of the consultation document.

10. Minerals and aggregates are needed to make infrastructure more resilient to resist extreme weather events. They will be required to build the structures that will protect against the ravaging effects of stronger storms, sea level rise and increased flooding on our infrastructure, communities and ecosystems.
11. The flooding and coastal erosion that threatens our infrastructure, and livelihoods is already being protected by quarried rock in the form of seawalls. New and strengthened sea walls and other such protections made from rock and/or steel-reinforced concrete will be required as sea level rises. Sea walls stabilise coastal roads and rail corridors and provide enhanced community facilities.
12. Demand for steel and concrete will undoubtedly increase as climate change occurs. Sand, limestone and aggregates are essential to make concrete. Coking coal and iron ore (including ironsands) are key ingredients of steel. New Zealand produces these essential minerals and if we don't mine them here, they will have to be imported, which will add cost and the environmental impacts of travel from a distant location.
13. To the extent climatic events overcome these protections, the damage to homes and infrastructure will again require aggregates and other minerals to fix and replace the damage. Where climate impacts require relocation or retreat of communities, whether in preparation for, or response to climatic events, minerals and aggregates, as key components of the construction sector, will be at the fore in the form of concrete, steel and other construction materials.
14. It is likely that a range of other minerals New Zealand has prospectivity in will be needed for existing and future technology to adapt to climate change and the regulatory environment will need to accommodate this, as discussed in the next section.

The regulatory environment

15. To optimise the contribution the extractive sector makes to climate change adaptation it is essential that extractive opportunities are available and accessible in New Zealand.
16. Aggregate and mineral supply is constrained in New Zealand and the country is already experiencing shortages in many places. Demand for aggregates is forecast to increase as New Zealand's population and economy grows over the coming years, which will further exacerbate the shortages. Such forecasts do not incorporate the need for climate adaptation or managed retreat which will create even more demand and stretch the supply even further.
17. Mineral extraction in New Zealand is highly regulated so that associated environmental impacts are minimised. We fully support environmental regulations which together ensure extractive activities meet the standards demanded by society while enabling the sector to make its contribution. Where materials are imported, the same standards have not necessarily been applied.
18. It will be essential that the National Planning Framework, being prepared under the resource management reform, gets this balance right and is accommodative of mineral extraction to facilitate the production of sufficient minerals and aggregate in New Zealand.
19. A key feature of the sector that the regulatory environment needs to allow for is the fact that mineral and aggregate deposits are finite and can only be sourced where they are physically located. There is a need for careful planning by local authorities to ensure sites suitable for

extraction are protected and access must not be inadvertently shut off. A regime which provides for exploration is important.

Other comments on the documents

20. The Draft Plan has a significant section on infrastructure and makes several references to the New Zealand Infrastructure Strategy, completed recently by the Infrastructure Commission, Te Waihanga. This strategy is important for the adaptation plan because of the need to strengthen the resilience of our infrastructure.
21. We note that the strategy makes several mentions of the importance of aggregates and steel to the provision and renewable of infrastructure, and the need for careful planning by local authorities to ensure sites suitable for aggregate extraction are protected. For example, Recommendation 28 of the strategy emphasises the need for security of supply of aggregate, bitumen, cement, concrete and steel.
22. It is important that the National Adaptation Plan and the Infrastructure Strategy feed into each other because of the overlaps and we support this.

Conclusion

23. The extractive sector will play a vital role in adapting to climate change and the National Adaptation Plan needs to recognise this. So that the sector can meet its potential in this regard, the regulatory regime needs to be accommodative and we encourage continued engagement with the sector as the plan is developed. It is better for New Zealanders and our environment that what is available here is sourced here, rather than having to be imported. Where materials have to be imported, the same high employment and regulatory standards that prevail in New Zealand may not necessarily apply. There is also the environmental burden of sourcing materials from a distance and getting them to New Zealand to consider.